

Ad Hoc Alliance for Public Access to 911

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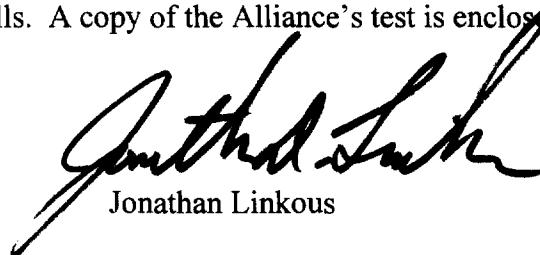
June 22, 1998

Magalie Salas
Secretary
Federal Communications Commission
1919 M Street, NW, Room 814
Washington, DC 20554

Re: Ex Parte Meeting
CC Docket 94-102

Dear Ms. Salas:

On June 18, 1998 Carl Hilliard and I met with Dan Phythyon, John Cimko and Nancy Booker about the above referenced docket. During the meeting we went over the position of the Alliance regarding strongest signal and included documentation of tests that the Alliance performed on a cellular telephone that is capable of performing the strongest signal operation for emergency calls. A copy of the Alliance's test is enclosed.


Jonathan Linkous

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Strongest Signal Test

The Audiovox model MVX405 was tested to determine if it practiced the "Strongest Signal" algorithm. This algorithm is being debated by the industry and consumer groups before the FCC. The results of these tests show the Audiovox model MVX405 practices the "Strongest Signal" algorithm without any noticeable delay in call completion time.

The Audiovox MVX405 was programmed to the "A-Only" setting and it was turned on in the service area of both an A-Side and B-Side cell site. The A-Side signal strength was measured on an M-SAT test unit at -76dbm while the B-Side signal was measured at -88dbm on the same M-SAT test unit. Two calls were placed to 911. The MVX405 was successful in completing both calls, without delay, to the PSAP which identified the source of the call to them as coming in from the A-Side carrier's system. Calls to other numbers from the MVX405 were intercepted by the A-Side system as no phone number was programmed into the MVX405 at this time (an uninitialized phone). The location of the test was moved to a place where the A-Side signal strength was measured at -85dbm on the M-SAT test unit and the B-Side signal was measured at -72dbm on the same M-SAT test unit. The MVX405 was then used to place three calls to 911. These calls successfully completed, without delay, to the PSAP which now identified the source of the call coming to them as the B-Side carrier's system. The MVX405 was still programmed to the A-Only setting. All calls to numbers other than 911 placed on the MVX405 from this location were again intercepted by the A-Side carrier's system.

The MVX405 was reset to the B-Only system setting. Call attempts from this location were now intercepted by the B-Side carrier's system. Two calls were placed to 911. Both calls were successfully completed, without delay, to the PSAP which reported the calls as being delivered by the B-Side carrier's system. The test location was returned to the first test area where the A-Side signal strength was measured at -75dbm on the M-SAT test unit and the B-Side signal strength was measured at -84dbm on the same M-SAT test unit. Several calls were attempted on the MVX405 and all were intercepted by the B-Side carrier. Three calls were then placed on the MVX405 to 911. All three calls completed successfully, without delay, to the PSAP which reported that the calls were being delivered from the A-Side carrier's system. This process of handling 911 calls from the MVX405 handset is exactly what the "Strongest Signal" algorithm describes.

No entries were made to the SID management table in the MVX405. The SID management table is used to steer the handset away from undesired systems when the handset is roaming. This practice is instituted by the serving carrier to control roaming costs by avoiding systems that the phone would otherwise choose to use based on the normal system selection criteria. For instance, a customer of the A-Side carrier may be set to the A-Preferred system selection setting. This setting will cause the handset to seek out any A-Side system when its home system is unavailable. When the A-Preferred handset is roaming it will always seek out the A-Side system if one is available. It will switch to the B-Side only when no signal is detected from an A-Side system. This preference was not a problem when the wireline carriers owned only B-Side properties

and the non-wireline carriers owned only A-Side properties. That is no longer the case as more and more consolidation has occurred. Therefore carrier's now own adjacent properties that are on opposite sides. (i.e. A carrier owns the A-Side system in an MSA and the B-Side system in an adjacent RSA or MSA) Normal system selection would steer service to the competitor's system when a handset roams.

By using the SID management function, the SIDs of non-preferred A-Side systems and non-preferred B-Side systems can be entered into a table in the handset. Therefore when the A-Preferred handset encounters an A-Side SID that is on the non-preferred list, the handset will switch to the B-Side system and check to see if that system is allowed. If both systems are non-preferred, or if the only system available is non-preferred, the handset will indicate that "No-Service" is available to the user. This simulated "No-Service" condition will prevent normal calls from being placed until the handset returns to an area served by a preferred system. However, emergency calls to 911 are allowed to be placed while the handset is in this simulated "No-Service" condition. These 911 calls are placed on whatever non-preferred system that is available to the handset.

The tests performed on the MVX405 did not have any relation to the SID management function available in this handset, as this table was empty and all SIDs encountered were therefore allowed SIDs. The handset never displayed the "No-Service" indication mentioned above.